In-the United States District Court, For-the-Western-District, of-Virginia, Danville-Division:

Charles Davis Burrell, Plaintiff,

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4:190/00010

CLERKS OFFICE U.S. DIST. COURT

AT DANVILLE, VA

- (1)-Marcia P. Sellers,
- (2)-Beverly Mapson,
- (3)-Isaiah Devon Sellers,
- (4)-Kevin (Doe),
- (5)-<u>'Supervisor'</u>, at 'Planet-Fitness', (John-Doe),
- (6)-Photographer (Jane Doe)

<u>'Serve-On'</u>: Marcia P. Sellers, at '210-Londonshire-Terrace, Hampton, Va. 23666'. 2.

'Motion-For-Judgment'

'Comes-Now', 'Your-Instant-Plaintiff', Charles Davis
Burrell, and, 'Herein-Propounding', the 'Above-StyledMotion', 'While-Seeking-the-Sum', of '1,000,000.00Dollars' ('One-Million-Dollars'), as 'Nominal', 'Compensatory',
& 'Punitive-Damages', in-the 'Above-Styled-Matter', 'AtBar'!!!

'Cause-of-Action/Factual-Background'

<u>Counts-One-Thru-Three</u>: "...Desertion...",

"...<u>Breach-of-Verbal-Contract</u>...", '...IntentionalInfliction-of-Emotional-Distress...":

- 1. On <u>'4-March-17'</u>, and, at 'Approximately-1:30-P.M.', Marcia P. Sellers, <u>'Entered-Into'</u>, "...<u>Holy-Matrimony</u>...", with <u>'Your-Instant-Plaintiff'</u>!!!
- 2. At 'Approximately-2:30-P.M', 'On-4-March-17', the 'Instant-Plaintiff', 'Paid-the-Sum-of', 'Approximately-\$342.00', for-a 'Wedding-Reception', at-the "...Red-Lobster-Restaurant..."!!!

- 3. <u>'Approximately-2-Hours-Later'</u>, 'Your-Instant-Defendant', <u>"...Took-Off..."</u>, "...<u>Without-Prior-Notification</u>...", to-the <u>'Instant-Plaintiff'</u>, with-her "...<u>Suspected-Lesbian-Friend</u>...", <u>'Beverly-Mapson'</u>; & "...<u>Attended-A-Basketball-Game</u>...", at-a <u>'Local-College'</u>!!!
- 4. At 'Approximately-10:30-P.M', that-Evening, 'Beverly-Mapson', 'Called-the-Instant-Plaintiff', and "...Relayed-A-Message...", to-the 'Instant-Plaintiff', that, the 'Plaintiff's-New-Bride', 'Marcia P. Sellers', wanted-the 'Plaintiff', to "...Meet-Her...", 'At-Her-House', "...Immediately...", or "...A.S.A.P...."!!!
- 5. And, <u>'Even-Though'</u>, 'Your-Plaintiff', was <u>'Quite-Confused'</u>, <u>'At-the-Time'</u>, the <u>'Plaintiff-Did-Comply'</u>!!!
- 6. 'Upon-Arrival', at <u>'Your-Defendant's-Residence'</u>, the 'Plaintiff', was <u>'Convinced'</u>, by-the 'Defendant', that '...<u>All-Was-Well</u>...'; and, that, the

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<u>'Both-of-Us'</u>, should <u>'Immediately-Proceed'</u>, on 'Our-Honey-Moon'!!!

- 7. 'Your-Plaintiff', <u>'Finally-Agreed'</u>; and, <u>'Both-Parties-Agreed'</u>, to "...<u>Secure-A-Suite</u>..."('With-A-Jacuzzi'), at-the '...<u>Holiday-Inn</u>..."!!!
- 8. 'By-Then', it-was, 'Approximately-3-A.M.', on '5-March-17'!!!
- 9. However, 'Just-Minutes', 'Prior-To', the 'Two-of-Us', were 'Scheduled-to-Enter', '...Our-Honey-Moon-Suite...", 'Your-Defendant's', '18-Year-Old-Son', 'Isaiah-Devon-Sellers', who-had, "...Just-Recently-Been-Released-From-Jail...", 'Called-the-Defendant', and, 'Reported', to 'His-Mother', that-he, had "...Just-Locked-Himself...", "...Out-of-the-House...", "...Demanded...", that, 'Your-Instant-Defendant', "...Immediately-Abandon-Her-Honey-Moon...", & "...Return-Home...", to "...Admit-Him...", 'Into-the-House'!!!

10. 'Your-Defendant', then "...Demanded...", that, 'Your-Instant-Plaintiff', "...Immediately-Drive-Her...", 'Approximately-20-Miles', 'Back-Home'

<u>'So-that-She'</u>, <u>'Could-Comply'</u>, with, 'Her-Son's', "...<u>Direct-Orders</u>..."!!!

- 11. "...Needless-to-Say...", "...Any-Honey-Moon-Plans...", "...Were-Instantly-Abandoned...", 'For-That-Night', 'After-That-Little-Fiasco', 'With-Her-Son"!!!
- 12. 'From-that-Point-On', 'Your-Instant-Other-Defendant', 'Beverly Mapson', 'Has-Vigorously-Engaged', the 'Plaintiff's-New-Wife', to 'Drive-Her', "...All-Over-the-Country-Side...", 'In-Order', to 'Keep-the-Plaintiff's-Wife', "...Away-From-Her-New-Husband..."!!!---And-thus, 'From-that-Point-Forward', the 'Plaintiff', "...Rarely-Saw...", or "...Other-Wise-Communicated...", 'With-his-New-Wife'!!!

13. And-then, on <u>'9-April-17'</u>, the "Instant-Defendants<u>"</u>, <u>'Marcia P. Sellers'</u>, 'Along-With', 'Of-Course', <u>'Beverly-Mapson'</u>, <u>'Came-Over'</u>, to-the 'Plaintiff's-Residential-R.V.', 'Where', <u>'Both-Parties'</u>, "...<u>Informed-the-Plaintiff</u>...", that, 'Marcia

P. Sellers', "...<u>No-Longer-desired</u>...", "...<u>To-Be</u>...", "...the <u>'Instant-Plaintiff's-Wife'</u>..."!!!

"Law & Argument"

- 14. 'Your-Instant-Plaintiff', "...<u>Was-Completely-Emotionally-Devastated</u>...", 'By-that-Action'!!!
- 15. 'Plaintiff', 'Immediately-Experienced', "...Severe-Emotional-Distress..."!!!
- 16. 'Your-Defendant', 'Marcia P. Sellers', had "...Made-A-Legal-Verbal-Contract...", 'Before-Multiple-Witnesses', to "...Honor-Her-New-Husband..."; And-Yet; 'Instead', 'She-Completely-Deserted-Her-Husband', 'Just-One-Day', 'After-She', "...Was-Reasonably-Sure...", that-She, 'Had-

<u>Obtained'</u>, "...<u>Veteran-Monetary-Benefits</u>...", by "...<u>Marrying</u>...", <u>'Your-Instant-Plaintiff'</u>!!!

17. 'Virginia-Law', is 'Opposed', and 'Contrary', to 'Such', "...'Blatant', 'Wanton', & 'Intentional-Fraud'..."!!!

18. 'Your-Instant-Defendant', 'Was-Well-Aware', of 'That-Fact', "...After-Serving-Eight(8)-Years...,

in-a <u>'Federal-Prison'</u>, for-the <u>'Same-Type'</u>, of <u>"...Fraud..."</u>, in <u>'New-York'</u>, & <u>'Chicago'</u>!!!

'Wherefore', the 'Instant-Plaintiff', 'Herein-Moves', this 'Great-Court', for 'Judgment', 'Against', "...The-Instant-Defendants..."; and, forthe 'Imposition', of 'Any-Other-Awards', that, the 'Court'-Should-Deem', "...Just & Proper..."!!!

'Sincerely-Submitted-By',

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